

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$10,616.77 in U.S. CURRENCY,

Defendant

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CIVIL NO. 22-cv-304

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**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Plaintiff, the United States of America, by its attorneys, Erik L. Barron, United States Attorney for the District of Maryland, and Stephanie Williamson, Assistant United States Attorney, brings this verified complaint for forfeiture in a civil action *in rem* and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil forfeiture action *in rem* against seized currency that constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1344, and therefore should be forfeited to the United States pursuant to 18 U.S.C. § 981.

The Defendant *In Rem*

2. The defendant property consists of \$10,616.77 in U.S. Currency seized from the State Employees Credit Union of Maryland account ending in x0740 held in the name of the State Employees Credit Union and previously located in the State Employees Credit Union of Maryland account ending in x9086 held in the name of Gabriel Taiwo (the “Defendant Property”), pursuant to an Agreement to Surrender Property executed by a representative of the State Employees Credit Union of Maryland on August 31, 2021.

3. The Defendant Property is presently in the custody of the United States Secret Service in the State of Maryland (Asset ID: 21-USS-000353).

4. The United States brings this action *in rem* in its own right to forfeit all right, title and interest in the Defendant Property.

5. This forfeiture is based on, but not limited to, the evidence outlined in the attached Declaration of U.S. Secret Service Special Agent Rahul Vinayak, which is incorporated herein by reference.

#### Jurisdiction and Venue

6. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 18 U.S.C. § 981.

7. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

8. Venue is proper in this district pursuant to 28 U.S.C. § 1395 because the Defendant Property is located in this district.

#### Legal Basis for Forfeiture

9. The Defendant Property is subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because it constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1344.

**WHEREFORE**, Plaintiff, the United States of America, prays that all persons who reasonably appear to be potential claimants with interests in the Defendant Property be cited to

appear herein and answer the Complaint; that the Defendant Property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the United States dispose of the Defendant Property according to law; and that the plaintiff receive such other and further relief as this Court deems proper and just.

Respectfully submitted,

Erek L. Barron  
United States Attorney

\_\_\_\_\_/s/  
Stephanie Williamson  
Assistant United States Attorney

**VERIFICATION**

I, Rahul Vinayak, a Special Agent with the United States Secret Service, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing Verified Complaint for Forfeiture *In Rem* is based on reports and information known to me and/or furnished to me by other law enforcement agents and that everything contained therein is true and correct to the best of my knowledge and belief.

Date: 2/3/2022



Rahul Vinayak  
Special Agent  
United States Secret Service